MEMORANDUM OF CONFERENCE

July 20, 1971

File: pp# OF0 906

BETWEEN	:	Mr. D. Rosen	- E. I. du Pont de Nemours, Wilmington, Delaware
		Dr. Ki Poong Lee	- Pathology Department E. I. du Pont de Nemours
		Dr. J. G. Aftomis	- Pathology Department E. I. du Pont de Nemours
		and	
		Dr. Clara Williams	- Toxicology Branch, PTD/EPA
		Dr. George Whitmore	- " " " " " "
		Dr. Mary Quaife	- " " " " " "
		Dr. K. J. Davis	- EPA Pathologist

SUBJECT : Benomyl, Pesticide Petitions including No. OF0906

Visitors came to discuss slides they had made on tissue sections of all 500-ppm and all 100-ppm dogs from the 2-year feeding study on benomyl, viz. fat stains on liver and iron stains on bone marrow, as requested by EPA for consideration of safety of any future tolerances.

They said all findings are negative in these slides. They will submit a detailed report of findings and interpretations of these.

Discussion concerned whether they are to do complete histopathological study of all dogs at both 100 and 500 ppm. Visitors contend what they have already done--complete study of highest-level dogs plus study of target tissue(s) of lower-dose dogs--should suffice. We feel, as explained by Dr. Davis, that, for a substance such as benomyl which will occur very extensively in the food supply, a mere "screening" test such as they have done will not suffice. We should have results of a complete study of tissues at the level of dietary intake which Petitioner claims to be "no-effect."

A compound given at very high levels may be lethal before it can exert effect on body systems which will be affected when given at lower levels; we need to include both possible types of toxic effects in gathering toxicological information on it.

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It was agreed that, unless Dr. Davis tells Mr. Rosen of further requirements, Petitioner will submit complete histopathologic study (and report of same) on tissues of all 500-ppm dogs (from the 2-year feeding study on benomyl). If all results are negative, he need not study tissues of 100-ppm dogs; otherwise he will need to so do. Also, of course, he must provide us with a report on the aforesaid liver and bone marrow stains of the 100- and 500-ppm dogs, together with interpretation of results.

Asked whether benomyl is "systemic," visitors said, "It penetrates but is not distributed."

Told consideration is being given to need for tolerance on a common metabolite of benomyl and another economic poison, visitors opined that, "That is premature."

They said that more tolerance requests for benomyl are planned which will eventually cover most fruits and vegetables and probably require tolerance requests for meat and milk.

There are some post-harvest uses for benomyl planned.

Shortly after the conference, Mr. Rosen contacted Dr. Davis and was told to study all tissues of 500-ppm dogs first.

Mary Quaife, Ph.D.
Toxicology Branch
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cc: OGFitzhugh
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Division Reading File
Branch Reading File
PP No. 0F0906
MQ

MQuaife/plb
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Init: GEWhitmore

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